CITY OF ROCKS NATIONAL RESERVE
Plan and Environmental Assessment

RESTROOM IMPROVEMENTS

December 10, 2002

City of Rocks National Reserve
P.O. Box 169
Almo, Idaho 83312
(208) 824-5519

Summary

This document examines the need for an additional restroom in City of Rocks National Reserve and the alternatives available to meet this need. It examines the natural and cultural resources affected by this decision. It recommends the placement of a vault toilet and parking area near Finger Rock. This document proposes the replacement of an older unit at Bath Rock, and recommends the removal of an older, infrequently used and non-ADA compliant toilet from Elephant Rock. The superintendent recommends a Finding of No Significant Impact (FONSI) on the proposed Finger Rock vault toilet installation, and categorical exclusions to NEPA for the Bath Rock vault replacement and Elephant Rock vault removal.

Table of Contents

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City of Rocks National Reserve, located in South Central Cassia County, is a partnership between the National Park Service and the Idaho Department of Parks and Recreation as established by Public Law 100-696 and Cooperative Agreement No. 1443-CA9000-96-002.

More information about City of Rocks can be found on the World Wide Web at either of the two official addresses below:

http://www.idahoparks.org/parks/city-rocks.html

http://www.nps.gov/ciro/index.htm

CHAPTER 1.O PURPOSE AND NEED FOR ACTION

City of Rocks National Reserve (CIRO) was established by Public Law 100-696, known as the Arizona-Idaho Conservation Act of 1988. The law states the purpose of the reserve is "*to preserve and protect the significant historical and cultural resources; to manage recreational use; to protect and maintain scenic quality; and to interpret the nationally significant values of the reserve*." In order to manage recreational use in such a manner as to protect resources and public health, CIRO Chief of Maintenance, Randy Farley, has determined that a need exists for the installation of an additional restroom, the replacement of an older restroom, and the removal of an older wood-framed vault.

Finger Rock Vault Toilet Addition

Located at the north end of the reserve along Logger Springs Road (see map in appendix) are campsites 75-78. From late May through October these campsites have a 17% occupancy which is equivalent to serving 1,794 visitors. The nearest restroom is located at Bread Loaves, approximately 1.8 miles away. It is proposed that a Gunnison-style toilet and small parking area be developed south of the road near Finger Rock. This facility would serve campers, day-use climbers and hunters in the reserve and adjacent Sawtooth National Forest. The restroom will improve public health and visitor satisfaction, and will not significantly impact natural resources or viewshed.

Gunnison-style toilet example

Although not specifically called for in the City of Rocks National Reserve Comprehensive Management Plan (CMP), the proposed restroom would be located adjacent to the public use and development zone. The CMP does call for a parking and scenic viewpoint a mile north that the restroom could serve. The CMP did not specifically call for sites 75-78, or for their removal. These sites have existed since the planning process, are currently needed to meet the camping demand, and are well designed and situated into the landscape. If these sites remain, a restroom facility is warranted, and would be properly situated so as to minimize visual impact.

Bath Rock Vault Toilet Replacement

One of the first vault toilets installed by CIRO was located at Bath Rock, the primary meeting place for campers and day-users. Since its installation in 1989, the parking area, trailheads, wayside exhibits and campsites have been developed or improved. The architecture of this vault no longer matches the newer models. It has endured heavy snows, vandals and significant public use. It is no longer situated at the proper height, given the upgraded parking surface developed in 1996. This unit currently serves most of the day-use visitors, and a considerable number of campers, especially sites 46-58.

Existing Bath Rock vault toilet

The CMP calls for a day-use development at Bath Rock, including parking, climbing, trailheads, picnicking and interpretive exhibits. Oddly, the CMP did not specifically list restrooms as a facility to be developed anywhere within the reserve. It would be expected that they would be placed in the public use and developed zones as needed; thus, as older facilities became less functional they would be replaced with new ones. One exception to this is discussed below.

Elephant Rock Vault Toilet Removal

Elephant Rock is one of the more popular rocks with climbers as it provides exceptional sport climbs near camping and parking. A small wooden, non-ADA compliant, vault toilet was placed at this location in the late 1980's. Now that a modern vault toilet is located nearby, this unit no longer meets a critical need. It is located in an area that is only visible to climbers around Elephant Rock, and does not serve other users.

Elephant Rock vault toilet planned for removal

The CMP does not call for development at Elephant Rock except for a wayside exhibit and associated parking. Removing the vault will reduce the number of facilities to maintain, or offset the addition of one proposed for Finger Rock.

Decision making process

The decisions to add, replace and remove vault toilets (as proposed above) began with the realization that a problem existed. In the case of Finger Rock, uncontained disposal of human waste has proven to be a public health and resource protection problem. The need to replace the unit at Bath Rock is based on several factors: age, deterioration, vandalism, settling, slope and architectural style. The problem with the unit at Elephant Rock is that it does not comply with ADA, it is infrequently used, it is old, the architectural style is not consistent with the newer installations, and replacement would require further resource impacts. Once determined, these problems were discussed in CIRO's management team meeting, and staff generated the possible solutions, including the proposed and alternative actions. These options were then presented to a larger pool of experts and stakeholders as listed in chapter 6 in a draft document. There comments, questions and concerns are included in the appendix, as well as responses from CIRO staff.

Relevant Issues

While replacing the Bath Rock vault and removing the Elephant Rock vault require little external consideration, the addition and development of a vault toilet and parking area at Finger Rock does. It involves ground disturbance and encroachment on native plants and animals. Its location may influence new visitor patterns and increase vehicle use on Logger Springs Road. It may impact the park budget, maintenance and personnel. Key questions to be considered are as follows:

1. Will the restroom development significantly reduce or prevent the uncontained human waste around campsites 75-78?

2. Does the development and increased activity affect crucial natural communities?
3. Will the disturbance affect cultural resources?
4. Will the viewshed be affected by the proposed location of the vault?
5. Can the reserve operation support a new facility at this location?

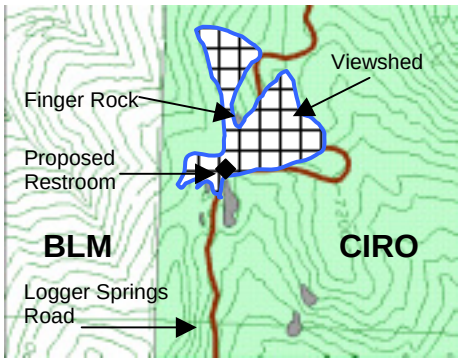
Responses to Relevant Issues

1. From the late 1970s to late 1980's the popularity of City of Rocks grew dramatically. One remote vault toilet located at an old BLM picnic area at Twin Sisters served the entire area. Due to either the remoteness or obscurity of the vault, most visitors practiced the "cat-hole" method of disposing of waste…or worse, left human waste exposed on the surface. When modern vault toilets were installed at Bath Rock in 1990 and then in other high use areas around the reserve, exposed human waste ceased to be a problem. The CIRO management team believes (based on previous actions) that the installation of a vault toilet at Finger Rock will be used, and uncontained disposal of human waste in that area will also cease.

Uncontained human waste at Finger Rock campsite

2. The proposed restroom does not affect crucial natural communities. Nesting or burrowing evidence is lacking. Although Golden-mantle Ground Squirrels are found among the nearby Almo Quartzite outcrops, neither the proposed vault nor parking area would significantly affect them. Yellow-belly Marmots have been observed among the crags of Finger Rock, but are not likely to venture into the proposed area. Other wildlife observed in the area would not be affected. See list in chapter 3.

3. Cultural resources in the area include nearby cattle allotment fences, modern campsites, and Logger Springs Road. Surface examinations revealed no lithic scatter or other man made objects. This particular area was the subject of an archaeological reconnaissance in 1990 by David & Jennifer Chance & Associates. The Finger Rock pass was the subject of a randomly selected 40-acre tract. The report lists no sites found. The proposed location is considerably distant from the primary cultural resources of the reserve, such as the California Trail, immigrant signatures, historic mines or ranching sites.



Extent of viewshed from proposed Vault

On July 15, 2002 Kirstie Heartel, archeologist with the Columbia Cascades Support office of the NPS met with Reserve Superintendent Wallace Keck to discuss Section 106 compliance on this project, and the survey conducted in 1988 and 1989 by David Chance at Finger Rock. Dr. Chance surveyed the area and did not identify any sites in the Finger Rock area. At the request of Wallace, Kirstie conducted an intensive (5 meter transects) pedestrian survey of approximately 2 acres that included the restroom

area, campsite and adjacent open land. Like Chance, she did not find any archeological material**.** (Note: Section 106 form is included in the administrative record)

4. Perhaps the greatest potential concern is that the vault toilet would encroach on the scenic viewshed. Considering the planned location (tucked into the curve of the road and obscured by Almo Quartzite outcrops and Mountain Mahogany, the encroachment is minimal and only seen from a bend in the road above Finger Rock for a short distance. See viewshed map on page 4 and also in appendix with photo points (page 20).

5. Logger Springs Road is generally open Memorial Day Weekend to mid-November. When drifting snow closes the park's north boundary, the Logger Springs Gate located in Emery Canyon is locked. Thus the park must clean and maintain the restroom on a daily basis from Memorial Day to Labor Day, and three times a week outside of the core season so long as the gate remains open. Approximately 15 minutes is required to clean and restock the restroom, and an additional 10 minutes is required to drive up and down Logger Springs Road from the last vault toilet currently on the route. This is not, however, an entirely new demand on the park operation. The fee collection ranger travels daily to the campsites, and could monitor use to determine if the restroom needs restocked or cleaned. Other maintenance personnel visit the campsites to clean grills, paint tables, check road conditions and maintain signs. Additional trips to the area would provide safety and compliance. If the vault toilet at Elephant Rock is removed as proposed, the time used to check and clean that facility would to some degree offset the new installation at Finger Rock. No significant impact to park operation is expected.

Summary of Remaining Chapters

The next chapter discusses in detail the proposed action for addressing the need, and alternatives to the proposed action. Chapter three discusses the affected environment and includes a brief resource inventory and assessment. Chapter four summarizes the environmental consequences and concludes the document with final decisions to be recommended. Chapter five lists those who prepared this document or whose work was consulted. Chapter 6 contains a list of the agencies and personnel consulted. An appendix concludes the document with maps, photos and illustrations that support the proposals.

Finger Rock proposed impact area for vault toilet and parking area

CHAPTER 2 ALTERNATIVES INCLUDING THE PROPOSED ACTION

This chapter discusses the proposed action for addressing the need, and alternatives to the proposed action. Each of the three proposed actions, their individual alternatives are discussed as 2.1 - Finger Rock (addition), 2.2 – Bath Rock (replacement), and 2.3 Elephant Rock (removal).

2.1 – FINGER ROCK (Vault Toilet Addition)

PROPOSED ACTION

The reserve proposes to add one vault toilet (to serve campsites 75-78) located south of the granite spire known as "Finger Rock" in the southern bend of the Logger Springs Road, specifically SW¼, SW¼, S23, T15S, R23E of the Almo, Idaho Quadrangle.

Materials required to place the Gunnison style toilet and construct the parking area include 40 feet of 16- inch diameter culvert, 127 cubic yards of fill and 63 cubic yards of road gravel. Total ground disturbance required for the vault is 2'6" deep by 9' wide by 17' long. Total area to be impacted by fill material is 40' along the existing road to 51' south of the road at the farthest point. Plans include the placement of a culvert, 127 cubic yards of fill and 63 cubic yards of gravel over fill. This development will prevent the uncontained disposal of human waste, and provide support facilities for compatible recreational activities. The proposed action is the environmentally preferred action and would not constitute impairment to park resources.

ALATERNATIVE 1

The vault toilet would be placed in the same location; however, the parking area would be replaced with a trail connecting to the road across from site 77. Campers in site 75-77 would walk to the restroom, and users from site 78 or day users would park at the oversized entrance to site 77 and walk across the road. This alternative addresses the primary problem with less overall impact to the site, however, encroachment on visitor experiences adjacent to the facility would occur. This alternative would not constitute impairment to park resources.

ALTERNATIVE 2

To prevent the uncontained disposal of human waste, campsites 75-78 could be closed to overnight use, converted to picnicking sites, or removed altogether. Where there is little use or no use, the problem decreases significantly. This alternative would not constitute impairment to park resources.

NO ACTION

Instead of investing funds into a new vault toilet and parking area, the park could redouble its efforts to educate visitors on proper human waste disposal, and increase enforcement of sanitary regulations. This alternative would not constitute impairment to park resources.

2.2 – BATH ROCK (Vault Toilet Replacement)

Tioga-style CXT pre-cast double vault toilet
Exposed Aggregate not shown

PROPOSED ACTION

The reserve proposes to replace the existing framed structure with one Tioga-style CXT pre-cast double vault toilet with Exposed Aggregate texture, located on the northeast side of the Bath Rock parking area, specifically SE¼, NW¼, S36, T15S, R23E of the Almo, Idaho Quadrangle.

138 cubic yards of fill gravel is required to place the Tioga style toilet, bringing the walk-in surface level to parking lot grade.

This replacement will upgrade a deteriorating facility, match the architectural style of other restrooms in the reserve, bring the restroom to a proper grade with the parking area, and continue to provide support facilities for compatible recreational activities.

The proposed action is the environmentally preferred action. The proposed action would not constitute impairment to park resources. The superintendent has certified that this action is a categorical exclusion to the National Environmental Policy Act. In the NPS Director's Order 12, the following Categorical Exclusions apply to this project:

(C8) Replacement in kind of minor structures and facilities with little or no change in location, capacity, or appearance—for example, comfort stations, pit toilets, fences, kiosks, signs, and campfire circles.

(C10) Changes in sanitary facilities operation resulting in no new environmental effects.

(C11) Installation of wells, comfort stations, and pit or vault toilets in areas of existing use and in developed areas.

Although it is exempt from further analysis, in the interest of full public disclosure of the entire restroom improvement plan, environmental analysis has been applied.

ALTERNATIVE 1

Staff members have considered removing the existing vault, rehabbing that site, and locating the new unit at the southwest corner of the parking area. The primary reason for this is the ability to work with a more natural grade. As in the proposed action, adequate parking is available there as well. This alternative action would not constitute impairment to park resources.

NO ACTION

Instead of replacing the existing double-toilet vault, the restrooms could be remodeled again and again as needed. However, replacement is inevitable, and the life span of a vault toilet will soon be reached. Opportunity and funding now exists to meet the needs previously outlined. At best, the decision could be postponed another five years, at which time the facility would be so degraded as to provide health and safety risks, and would reflect poorly on the reserve. However, the "no action" alternative would not constitute impairment to park resources.

2.3 – ELEPHANT ROCK (Vault Toilet Removal)

PROPOSED ACTION

Reserve staff propose the removal of the outdated, remote, infrequently used and non-ADA compliant vault toilet from the north side of Elephant Rock specifically located in the SE¼, SE¼, S36, T15S, R23E. Once the vault is removed, native vegetation would be restored, and social trails would overgrow with sagebrush in two years. The outdated structure would be donated to the Almo Community to relieve some of the demands on private businesses, or be sold by sealed bid to the public or be destroyed and properly disposed.

The proposed action is the environmentally preferred action. The proposed action would not constitute impairment to park resources. The superintendent has certified that this action is a categorical exclusion to the National Environmental Policy Act. In the NPS Director's Order 12, the following Categorical Exclusions apply to this project:

(C10) Changes in sanitary facilities operation resulting in no new environmental effects.

(E2) Restoration of non-controversial (based on internal scoping requirements in section 2.6) native species into suitable habitats within their historic range.

Although it is exempt from further analysis, in the interest of full public disclosure of the entire restroom improvement plan, environmental analysis has been applied.

ALTERNATIVE 1

Replace this unit with the modern Gunnison style vault toilet. Significant engineering would be required to make the current location ADA accessible, although the structure itself would comply. This alternative action would not constitute impairment to park resources.

NO ACTION

Though it is infrequently used, the vault could be left in place. To do so requires little expense beyond the 2-3 times a week inspection/cleaning, and the annual painting and minor repairs. The "no action" alternative action would not constitute impairment to park resources.

CHAPTER 3 AFFECTED ENVIRONMENT

SUMMARY
In the following sections, the affected environments are examined. Each proposal is discussed separately as 3.1 – Finger Rock, 3.2 – Bath Rock, 3.3 – Elephant Rock. In each proposal the microclimate, elevation, geologic structure, primary soil type, vegetation, fauna and human interaction is discussed.

3.1 – FINGER ROCK

The proposed vault toilet would be located at 7,120 feet above sea level. Although located in a saddle of the mountain where winds frequently reach 10-15 mph on normal days and can reach 50 mph during passing fronts or summer thundershowers, the restroom itself would be located in a pocket protected by surrounding exposed quartz granite boulders. Surface materials consist of grus (angular course grained fragments), sand, silt and humus from the accumulation of mountain mohagany foliage, pinyon pine needles and decomposed grasses and other forbes. Due to the level aspect of the site, erosion beyond natural processes is not expected.

Primary plant species within a 100-foot radius of the proposed impact area include mountain mahogany, sagebrush, chokecherry, snowbush, bitterbrush, prickly pear cactus, arrowleaf balsamroot and Oregon grape. No flora of special concern was noted near the proposed project, and a particular search for Simpson's hedgehog cactus was conducted without findings. This area is included in the Graham Creek allotment and is annually affected by grazing.

No amphibians were located near the proposed project. The Common Sagebrush lizard would be expected but was not encountered. Birds observed around the site include Vesper Sparrow, Northern Harrier and Brewer's Sparrow. Standing at the proposed site, one might observe in proper season and period of day 30 species of birds. No nests were located. Golden-mantled ground squirrel is also expected but not encountered during the survey. Other mammals that would be expected in the vicinity include yellow-belly marmot, coyote, mule deer, and various microtine rodents.

The proposed project affects no current human activity on the site, but would create new activity. Without proper planning, one or two social trails might develop. The visual impact is restricted and aesthetics and personal experience would not be impacted.

3.2 – BATH ROCK

The proposed replacement of the vault toilet would be located at 6,450 feet above sea level. It is situated in a level area adjacent to a parking area 150 feet from a county road and 250 feet from the canyon rim. Immediately behind (east of) the current vault restroom is a slightly mesic aspen grove community, and a mountain mahogany dominated community is located immediately south. These communities and the restroom's proposed location at the corner of the parking area would help to screen it from visual intrusion.

Due to the restroom's proximity to the parking area, surface materials include crushed gravel from a local quarry outside the park boundary. On the north side of the current building, the vegetation consists mainly of bitterbrush, sagebrush, prickly pear cactus and buckwheat. No encroachment on new vegetation is planned. Some temporary impacts may result when the old vault is removed from the ground, but is expected to naturally revegetate. This project, (basically a replacement and surface grade improvement), will not affect wildlife species. After completing the environmental screen form, it was determined that an environmental assessment is not needed for this phase of the restroom improvement plan, but is considered a categorical exclusion (C8, 10, 11 of the DO12 Handbook, page 38). The project lies entirely within a previously disturbed and currently developed area.

This phase of the restroom improvement project will continue an ongoing human activity, but in an improved manner, with a better grade from parking lot to restroom and newer, more pleasing facility that matches the architectural style of other recently installed vault toilets. This unit would be the most frequently used facility inside the reserve.

3.3 – ELEPHANT ROCK

The current vault toilet is located on the north side of a granite monolith known as Elephant Rock. The small building sits at an elevation of 6,225 feet. It is located adjacent to a grazing access and administrative road. A social trail connects the restroom to the base of the rock where climbers access several popular routes. Surrounding vegetation is dense and includes sagebrush, bitterbrush, prickly pear cactus and grass. The area of impact after removal does not exceed 12 feet x 12 feet.

Since this phase of the project calls for the removal of a man-made structure and restoration of the vegetation and visual impact, wildlife will only benefit from the action; therefore an inventory of effective species is unnecessary.

This phase of the restroom improvement would only slightly affect human activity. A longer walk (1,400 feet) to the next nearest restroom is required; however, as was previously stated, the Elephant Rock unit receives very little use, is small, non-ADA compliant and very old. What little effect it may have on human activity is possibly offset by the restoration of the viewshed (i.e. the removal of a man-made structure in the natural setting).

CHAPTER 4 ENVIRONMENTAL CONSEQUENCES

This chapter recaps the environmental consequences of each alternative for each of the three projects.

4.1 – FINGER ROCK

Environmental Consequences of the Proposed Action

The proposed action will affect the environment in that some vegetation will be lost, and development in a previously undisturbed location will occur. As was previously stated, this minor loss of vegetation is not only acceptable but also preferred to the status quo. Plant communities or individual species affected are numerous and common throughout the reserve. Wildlife that might be displaced is inconsequential considering the relatively small area to be disturbed and the vast habitat adjacent to the project. No cultural resources will be affected. The viewshed is not significantly disturbed from the restroom outward or from prominent vantagepoints inward. Additional impacts are summarized in the table below.

Resource Type	Impact	Boundary of Impact
Air	Minor infrequent odor	Immediately local
Water	No	No water resources present
Geological	Minor ground disturbance	Immediately local – 75 feet
Soils	Yes – compaction	Immediately local – 75 feet
Vegetation	Yes – removal	Immediately local – 75 feet
Wildlife	No	No wildlife displacement
Visual	Yes – minor obstruction	See viewshed, page 4

Environmental Consequences of Alternative 1

Alternative one would still impact vegetation where the vault toilet is placed and where social trails develop; furthermore, the installation process and routine pumping of the vault would affect nearly the same area. Not only would it be simpler to install the vault if the truck could off load directly to the site, but the absence of at least a few parking spots creates an unsafe traffic condition and encroachment on the privacy of site 77. It was also determined that impacts to the viewshed and natural resources would not significantly increase or decrease with alternative one over the preferred alternative. No cultural resources would be affected. Additional impacts are summarized in the table below.

Resource Type	Impact	Boundary of Impact
Air	Minor infrequent odor	Immediately local
Water	No	No water resources in contact
Geological	Minor ground disturbance	Immediately local – 75 feet
Soils	Yes – compaction	Immediately local – 75 feet
Vegetation	Yes – removal	Immediately local – 75 feet
Wildlife	No	No wildlife displacement
Visual	Yes – minor obstruction	See viewshed, page 4

Environmental Consequences of Alternative 2
Alternative two is difficult to determine. Where campsites are converted to day-use, there is less likely to be uncontained human waste accumulating, but there is no guarantee that it will cease altogether. Vegetation would remain the same as if no action is taken. The viewshed would experience no impacts. Demands (and consequently, impacts) on other campsites would increase if sites 75-78 were closed to overnight use. These sites are popular, and the overall demand for camping inside the reserve is high during May-September. Closing these sites to overnight uses creates more problems than it solves. Additional impacts are summarized in the table below.

Resource Type	Impact	Boundary of Impact
Air	Minor infrequent odor	Occasional local sites
Water	Minor - contamination	Local precipitation run-off
Geological	No	N/A
Soils	Minor – contamination	Occasional local sites
Vegetation	No	N/A
Wildlife	Minor – exposure to human waste	Rodents and Canids may occasionally encounter
Visual	Minor – uncontained human waste encountered	Occasional local sites

Environmental Consequences of No Action
Taking no action will result in further distribution of uncontained human waste. Increase in odor, the potential risk of disease and degradation to the visitor's experience will result. Vegetation and wildlife would remain, though wildlife may be adversely affected by contact with human waste. Increasing education, information and visitor compliance may help to a small degree, but the fact is many campers spend the night on the site before a ranger is able to make contact. Education could take place in the form of posters and signs on site, or brochures mailed to visitors when reservations are made. Experience has shown that visitors will take the most convenient choice when the need arises. It is nearly impossible to prevent the action because visitors violate sanitary regulations when they are most assured of privacy (i.e. when onsite compliance patrols are non-existent). Cultural resources and viewshed would not be affected. Additional impacts are summarized in the table below**.**

Resource Type	Impact	Boundary of Impact
Air	Minor infrequent odor	Several local sites
Water	Yes - contamination	Local precipitation run-off
Geological	No	N/A
Soils	Yes – contamination	Several local sites
Vegetation	No	N/A
Wildlife	Yes – exposure to human waste	Rodents and Canids may occasionally encounter
Visual	Yes – uncontained human waste encountered	Several local sites

4.2 – BATH ROCK

Environmental Consequences of the Proposed Action

In placing the Tioga-Style vault toilet at Bath Rock, the existing unit will be removed. During that process, the silence of the reserve will be disturbed by a jackhammer and backhoe used to break up the concrete vault and sidewalk. Temporary scattering of debris may occur, but would be removed following installation. Some vegetation immediately adjacent to the old vault would be disturbed during removal. Wildlife would not be affected. Since this is an existing developed area, no new disturbance of cultural resource would result. The viewshed would be temporary affected by equipment and construction, but following completion would be the same as before. Additional impacts are summarized in the table below.

Resource Type	Impact	Boundary of Impact
Air	Minor infrequent odor	Same as status quo
Water	No	N/A
Geological	No	N/A
Soils	No	Same as status quo
Vegetation	No	Same as status quo
Wildlife	No	No wildlife displacement
Visual	No	Same as status quo

Environmental Consequences of Alternative 1

Alternative 1 is the installation of the new vault in the SW corner of the parking area. This would result in two impacted areas instead of one. Restoration of the old vault location would take 2-3 growing seasons, and the new area would impact vegetation and viewshed to a much greater degree. Wildlife would be displaced from the new site, but eventually would return to the old site. Cultural resources are not affected at either location.

This alternative is not preferred by staff for two reasons, the location is more exposed (less natural screening exists), and the impact would then include an area currently undisturbed (or minimally disturbed by only a picnic table). This area is also used as the camp host site, and finding another centrally located and highly visible site for hosts has proven difficult. Additional impacts are summarized in the table below.

Resource Type	Impact	Boundary of Impact
Air	Minor infrequent odor	Same as status quo
Water	No	N/A
Geological	Yes	Granite hardpan breached
Soils	Yes – compaction and removal	Immediately local – 50 feet
Vegetation	Yes - removal	Immediately local 50 feet
Wildlife	No	No wildlife displacement
Visual	Yes - viewshed	Location more visibly exposed

Environmental Consequences of No Action
Since Bath Rock parking area and restroom are in a developed zone, no action would result in no further environmental consequences, that is until such time that the facility has reached the end of its useful life and must still be replaced. No action postpones any potential environmental consequences for only five years. If action were taken now, the consequences that would occur could be restored by then. Additional impacts are summarized in the table below.

Resource Type	Impact	Boundary of Impact
Air	Minor infrequent odor	Same as status quo
Water	No	N/A
Geological	No	N/A
Soils	No	N/A
Vegetation	No	N/A
Wildlife	No	No wildlife displacement
Visual	Yes	Eventual deterioration

4.3 – ELEPHANT ROCK

Environmental Consequences of the Proposed Action
To remove a manmade structure and restore the area disturbed by that structure has a positive effect on the environment: vegetation, wildlife and viewshed. Additional impacts are summarized in the table below.

Resource Type	Impact	Boundary of Impact
Air	No	Air quality improved
Water	No	No potential contamination
Geological	No	N/A
Soils	No	Soils restored
Vegetation	No	Vegetation restored
Wildlife	No	Habitat restored
Visual	No	Viewshed improved

Environmental Consequences of Alternative 1
To replace this unit with a new Gunnison-style vault would create negative environmental impacts. The access road would need to be improved (widened) and engineered for proper grade, a greater area would be cleared for the larger structure; ADA improvements would be mandated, and the viewshed would be impacted. All of these activities would negatively affect plants and wildlife.

To place a new toilet here makes little practical or economic sense. While a new unit would be more attractive, would possibly be used more frequently, would meet ADA standards, and would match the architectural style of the other units within the reserve, the impact would be greater, the expense unjustified, and the need essentially invented.

Resource Type	Impact	Boundary of Impact
Air	Yes – minor infrequent odor	Immediately local – 50 feet
Water	No	N/A
Geological	Yes - Granite hardpan breached	Immediately local – 50 feet
Soils	Yes – soils removed	Immediately local – 50 feet
Vegetation	Yes – vegetation removed	Immediately local – 50 feet
Wildlife	No	Same as status quo
Visual	Yes – slightly more intrusive	Immediately local – 50 feet

Environmental Consequences of No Action

Leaving the old vault toilet would not further affect vegetation or wildlife; however the viewshed would remained impacted. Leaving a structure in place that no longer meets a need detracts from the visual and ideological values of the reserve. No action contradicts the idea of keeping facilities to a minimum. When a facility no longer serves a significant purpose, it should be removed from the scene. Additional impacts are summarized in the table below.

Resource Type	Impact	Boundary of Impact
Air	Yes – minor infrequent odor	Immediately local – 50 feet
Water	No	N/A
Geological	No	N/A
Soils	Yes	Potential for contamination increases with time
Vegetation	No	Same as status quo
Wildlife	No	Same as status quo
Visual	No	Same as status quo

CHAPTER 5 LIST OF PREPARERS

Wallace Keck, Superintendent of City of Rocks National Reserve, wrote this document, and conducted the natural resource assessment for each proposed project. He has a degree in Fisheries and Wildlife Management from Arkansas Tech University. He has conducted natural resource assessments and inventories for 17 years. He co-authored the reserve's Resource Management Plan in 1996. As superintendent, Wallace has primary responsibility and accountability for CIRO's resources

Randy Farley, Chief of Maintenance at City of Rocks National Reserve, initiated the project requests and researched the design and materials required of the proposed. He is the employee responsible for maintaining, installing, replacing or removing similar structures. Similar projects were conducted in 1999. He is a skilled equipment operator and construction supervisor for carpentry, plumbing, electrical and concrete. He has served as the Chief of Maintenance since 1991. He has a Bachelors of Science from Brigham Young University.

Venna Ward, Administrative Officer at City of Rocks National Reserve, wrote the project statement as entered into the NPS Project Management Information System (PMIS). She has served at CIRO since 1994 in various capacities: trail crew leader, officer manager, natural resource/grazing compliance officer, interim superintendent and currently as the Administrative Officer. She is responsible for managing financial compliance for all park funds including project grants.

Others whose work or expertise was consulted are as follows:

Shea Lewis, Chief of Interpretation and Cultural Resources at City of Rocks National Reserve, reviewed this document for impacts on established plans and policies. As a member of the reserve's management team, he participated in the decision-making process.

Brad Shilling, Climbing Ranger at City of Rocks National Reserve, reviewed this document for recreational impacts on visitors and compliance to park rules and regulations. He participated in the decision-making process.

Kirstie Heartel, NPS Archeologist with Columbia Cascades Support Office was consulted on the previous archaeological work of David & Jennifer Chance. She also conducted a secondary surface reconnaissance of the Finger Rock proposed development site.

David & Jennifer Chance & Associates conducted and published The Archaeological Reconnaissance of the City of Rocks Reserve, 1990. Table 1, page 5 specifically documents that no cultural resources were found at the proposed development near Finger Rock.

Marsha Davis, NPS Geologist with Columbia Cascades Support Office, co-authored the City of Rocks National Reserve Resource Management Plan, which was consulted and referenced.

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BIBLIOGRAPHY

Public Law 102-575 National Historic Preservation Act of 1966 as amended through 1992
Public Law 91-190 National Environmental Policy Act of 1969
Public Law 100-696 Arizona-Idaho Conservation Act of 1988
NPS Director's Order 12, and Handbook for Environmental Impact Analysis
NPS Director's Order 28, and Cultural Resource Management Guidelines
1995 Programmatic Agreement between NPS, Natl. Conf. of SHPO and Advisory Council
2002 Programmatic Agreement between IDPR and Idaho State Historic Preservation Office
City of Rocks National Reserve Comprehensive Management Plan, 1994
NPS-IDPR Cooperative Agreement No. 1443-CA9000-96-002, 1996
City of Rocks National Reserve Resource Management Plan, 1996

Chance, David H. and Jennifer V., Archaeological Reconnaissance of the City of Rocks Reserve; 1990; David & Jennifer Chance & Associates

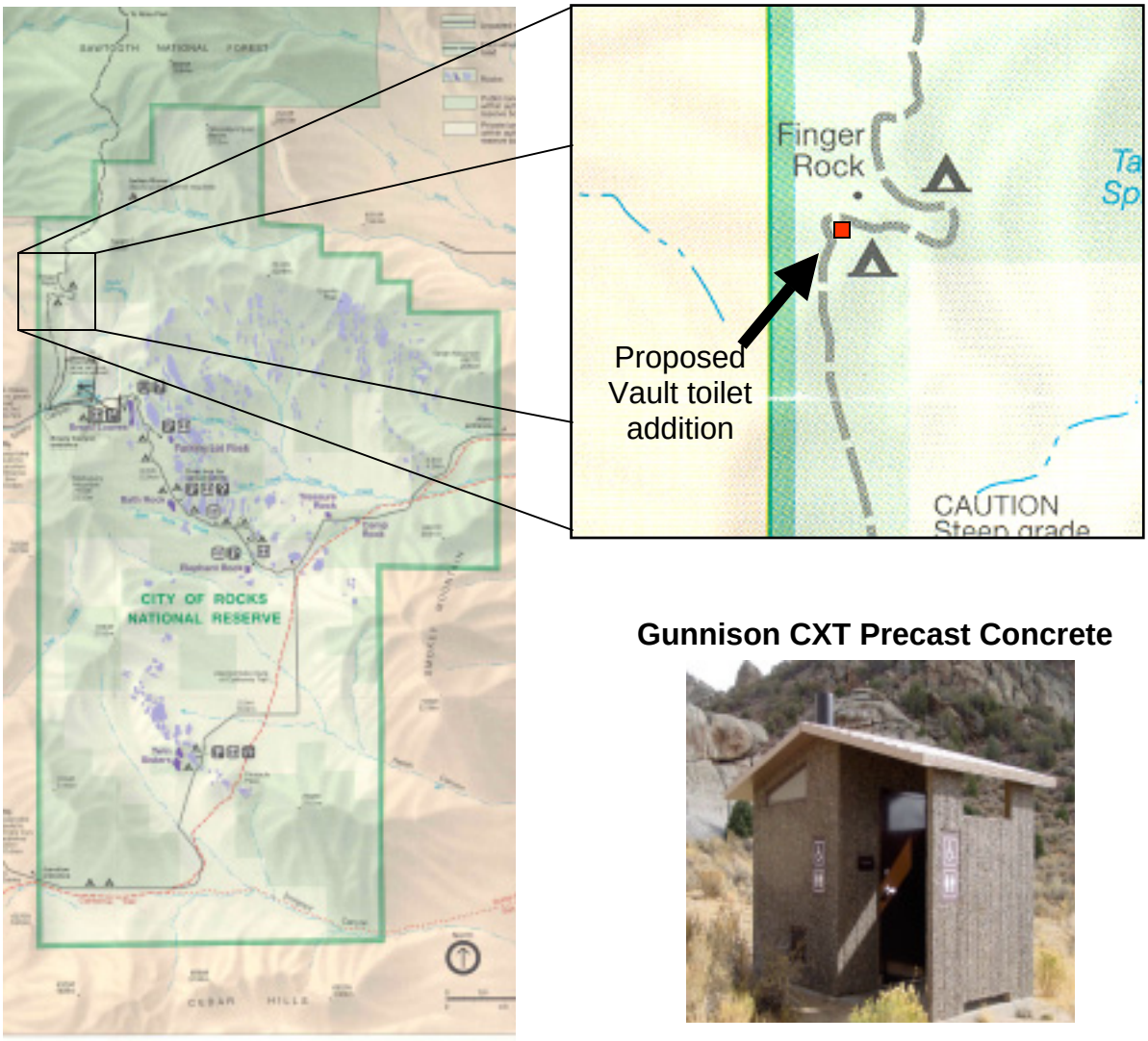
APPENDIX

- Project Location Maps and Photos

Documents not included in the plan, but part of the administrative record

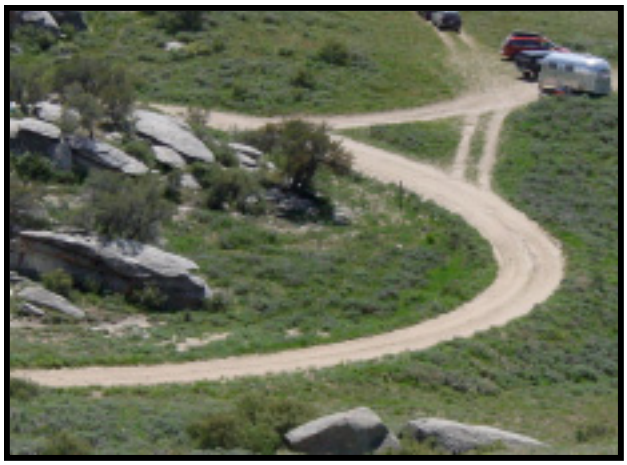
- Project Management Information System #65213
- Justification to changes on PMIS #65213 and revised budget
- Environmental Screening Form
- Categorical Exclusion for Bath Rock Vault Toilet Replacement
- Categorical Exclusion for Elephant Rock Vault Toilet Removal
- Section 106 Form – Assessment of Actions Having an Effect on Cultural Resources
- Email Correspondence from NPS Archaeologist, Kirstie Heartel
- Comments from document recipients with CIRO staff responses

Finger Rock Vault Toilet Addition



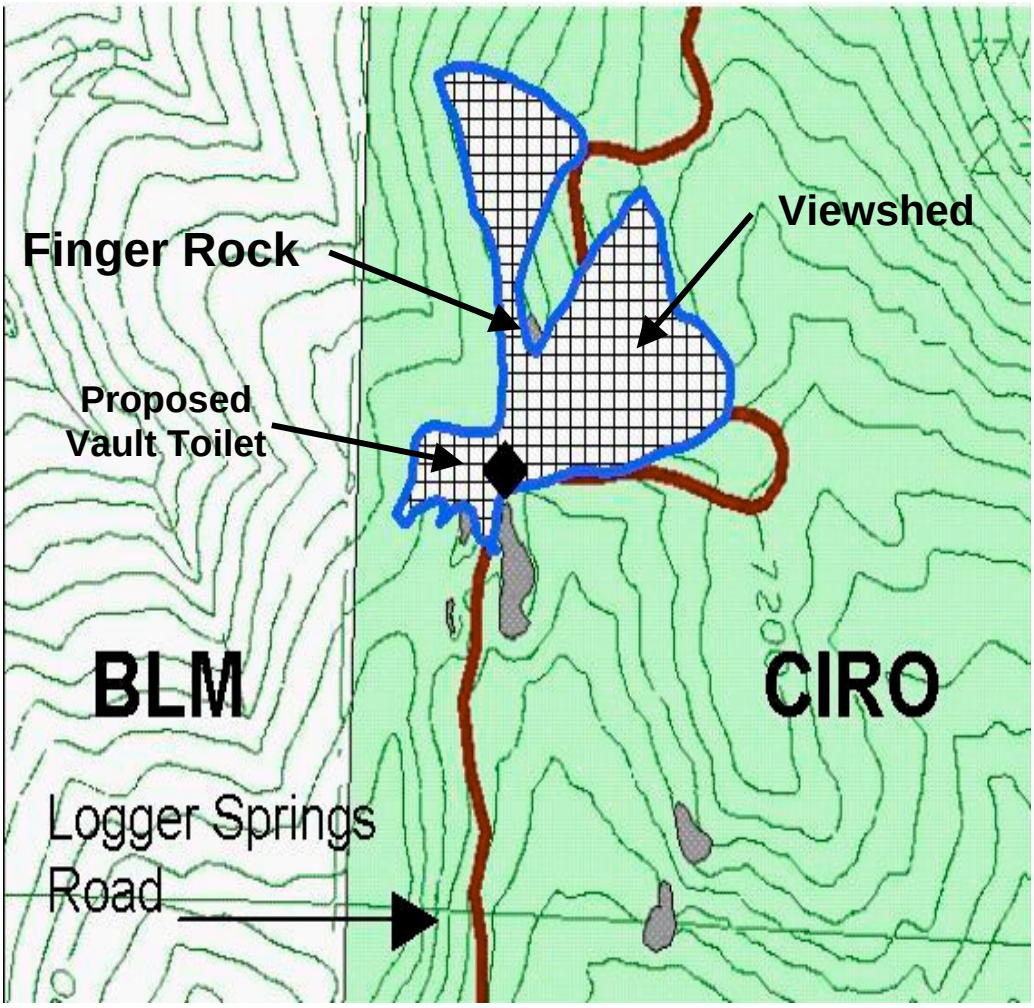
Gunnison CXT Precast Concrete

Before Development



After Development

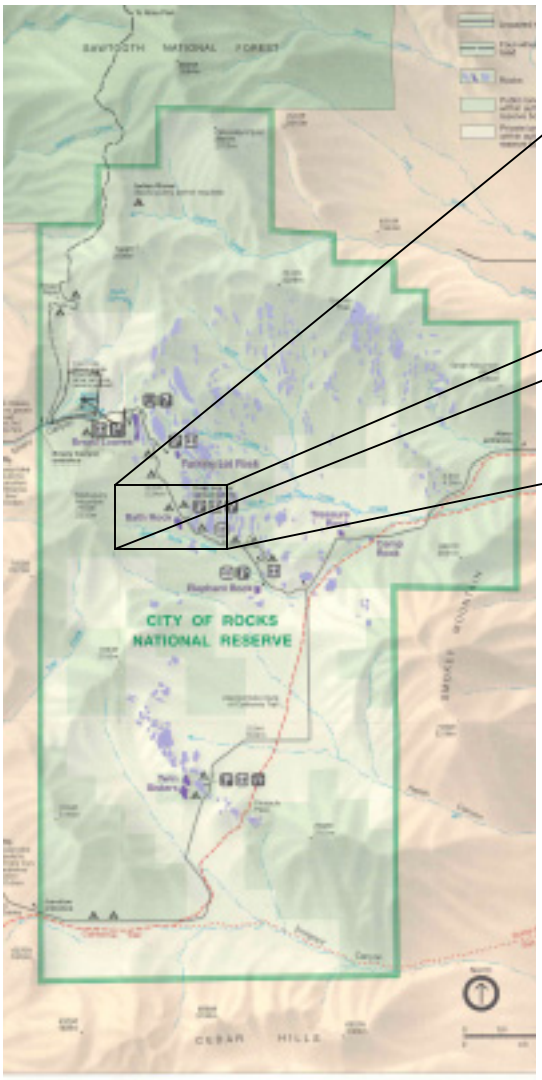
FINGER ROCK VIEWSHED AND PHOTO POINTS

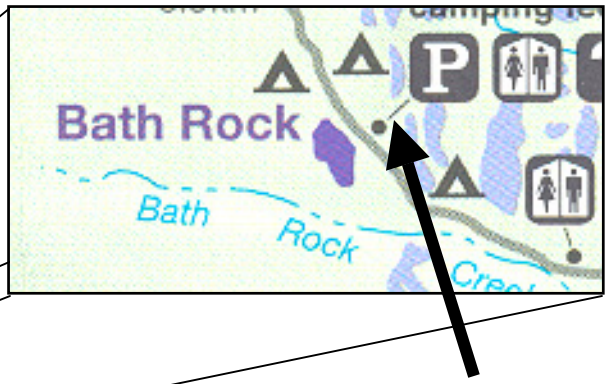


View NE from Campsite 77
Area of Impact circled

View W from Logger Springs Road
Area of Impact noted

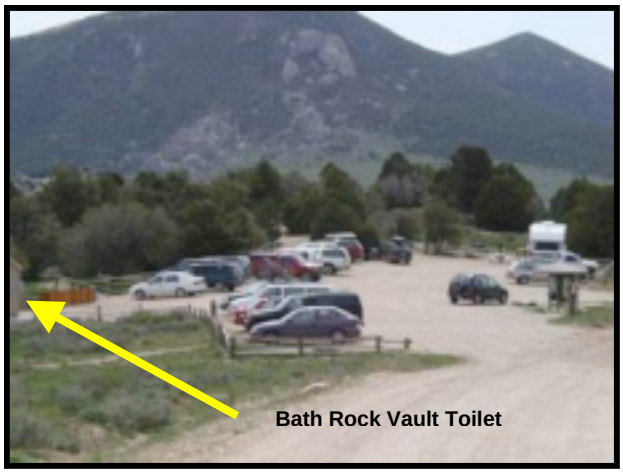
Bath Rock Vault Toilet Replacement





Proposed Vault toilet replacement

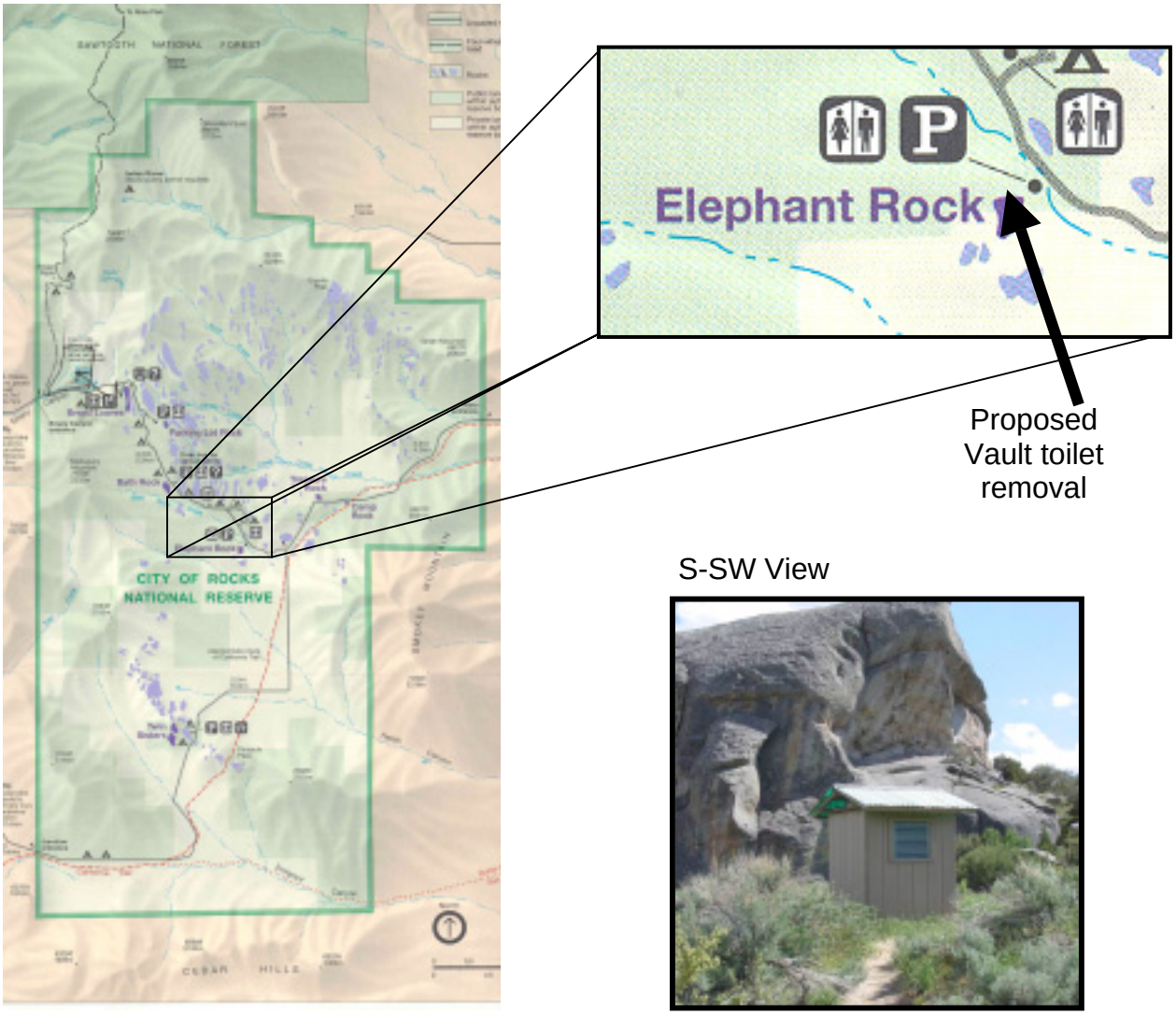
Location - view south



Before Replacement

After Replacement

Elephant Rock Vault Toilet Removal



S-SW View

Before Removal

After Removal